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March 24, 1986

Frank D. Hale
Research Manager
O'Brien & Gere Engineers, Inc.
Box 4873
Syracuse, N.Y. 13221

Subject: RI/FS Work, Safety and QAPP Plans
Granite City Site

Dear Mr. Hale:

On February 27, 1986 I met with the USEPA and IEPA personnel, noted below as receiving copies of this letter, to review NL's February 4, 1986 response to the agencies' comments regarding O'Brien & Gere's ("OB&G's") October 22, 1985 submittal of the subject plans. I agreed that Table 2, and any related sections, of the RI/FS Work and QAPP Plans would be changed to indicate that:

1. Samples of slag, bulk and drummed upper strata material, and hard rubber battery case remnants from the pile at the former St. Louis Lead Recyclers Operation will be analyzed for the following additional parameters: antimony, copper, iron, manganese, nickel, zinc and any other environmentally significant substances determined to have been present at the site as a result of OB&G's investigation pursuant to Task 1 of the RI. All analyses will ascertain the "total" presence of those parameters.

NL Industries, Inc.
Environmental Control Department
P.O. Box 1090, Hightstown, N.J. 08520 Tel. (609) 443- 2499

2. During the first quarter, all monitoring well samples will be analyzed for the parameters noted in Table 2, plus sulfate, suspended solids and the substances specified in the preceding section. Prior to preservation and analysis, all samples will be subjected to 0.45 micron filtration. In addition, 25% of the samples will be analyzed for unfiltered lead.
3. During the second quarter, we will analyze the well samples for the Table 2 parameters and those noted in Paragraph 2, that are present in "significant" amounts.
4. With respect to the surface soil program, we will analyze the off-site sample with the highest total lead above 1000 ppm for EP toxicity (all metallic parameters).
5. As we had agreed, the runoff samples would not be filtered.

With respect to my February 4, 1986 letter, the responses noted in Attachment 1 were accepted by the agencies. Regarding Attachment 2, my "General" response is applicable as we continue to await receipt of specific written or verbal comments from the USEPA. NL's position, expressed in Comment No. 1, has been modified as noted in Items 2 and 3 above. With respect to Comment No. 2, NL has agreed to provide certain unfiltered analyses as specified by Item 2. As NL did not understand the agencies' position, Comment No. 3 is withdrawn. With respect to NL's Comments No.'s 4, 5, and 6, we have not yet received USEPA's comments regarding the QAPP. Turning to Attachment 3, NL's General Comments No.'s 1 and 2 were modified as noted in Items 2 and 3. We agreed that General Comment No. 2 is acceptable. The balance of the Comments will be addressed by OB&G.

Please incorporate these changes in the Work Plan, but do not resubmit it until we have resolved the USEPA's questions regarding the QAPP.

On March 5, 1986 Mr. Bradley requested that we separate the QAPP from the Work Plan in order that approval of the former will not delay initiation of work on the latter. As we would prefer a unified document, I believe that an acceptable compromise position would be for OB&G to commence work directed at Tasks 1 and 2 of the RI as they

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have been tacitly approved by both agencies; by copy of this letter, I request the concurrence of Messrs. Bradley and Miller. Upon receipt of approvals, I will authorize OB&G to begin these tasks.

Very truly yours,


William K. Weddendorf

WKW/bf

cc: B. W. Bradley - USEPA V*
R. K. Cowles - IEPA (Springfield)
J. Frank - IEPA (Springfield)
R. M. Grimes - USEPA V
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